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June 7, 2016

**Document Filed Electronically**

Honorable Joseph A. Dickson, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King, Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Jazz Pharmaceuticals, Inc. v. Amneal Pharmaceuticals LLC, et al.*  
Civil Action No. 13-cv-391-ES-JAD (consolidated)

Dear Judge Dickson,

I, along with Maddox Edwards, PLLC, represent Defendant Amneal Pharmaceuticals, LLC ("Amneal") in the above-referenced matter. We write on behalf of all parties to respectfully request a modification to the claim construction phase of the case schedule.

In light of the Court's recent Order granting Plaintiff's extension to serve its Infringement Contentions and Responses to Defendant's Invalidity Contentions on August 12, 2016 (ECF No. 293), the parties have agreed to modify the claim construction schedule to begin after the Plaintiff has served its Contentions.

Accordingly, all parties have consented to the following proposed modification to the claim construction phase of the current case schedule (ECF No. 215):

Event	Current Scheduling Order (ECF No. 215)	Parties' Proposed Revised Schedule
Parties exchange proposed terms for construction. L. Pat. R. 4.1(a)	June 10, 2016	August 26, 2016
Parties exchange preliminary proposed constructions and identification of intrinsic and extrinsic evidence. L. Pat. R. 4.2(a)-(b)	July 1, 2016	September 9, 2016



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Event	Current Scheduling Order (ECF No. 215)	Parties' Proposed Revised Schedule
Parties exchange evidence opposing any proposed claim construction. L. Pat. R. 4.2(c)	July 15, 2016	September 23, 2016
Parties complete fact discovery relating to claim construction. L. Pat. R. 4.4	August 1, 2016	October 7, 2016
Parties file their Joint Claim Construction and Prehearing Statement. L. Pat. R. 4.3(a)-(e)	August 3, 2016	October 10, 2016
Parties file and serve their opening <i>Markman</i> submissions. L. Pat. R. 4.5(a)	September 16, 2016	November 4, 2016
Parties shall complete expert discovery pertaining to <i>Markman</i> issues.	October 19, 2016	December 2, 2016
Parties file and serve their responding <i>Markman</i> submissions.	November 2, 2016	December 16, 2016
Parties shall submit to the Court a proposed schedule for a <i>Markman</i> hearing.	November 30, 2016	December 22, 2016
<i>Markman</i> hearing	To be determined	To be determined

If the Parties' proposed schedule modification meets with Your Honor's approval, we respectfully request that Your Honor sign the below form of endorsement and have it entered on the docket.



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We thank the Court for its attention to this matter.

Respectfully submitted,

LERNER, DAVID, LITTENBERG,  
KRUMHOLZ & MENTLIK, LLP



PAUL H. KOCHANSKI

PHK/pk

cc: All Counsel of Record (via e-mail)

SO ORDERED:



Joseph A. Dickson, U.S.M.J.